

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

x

KAITLYN TIKKUN,

Plaintiff,

MOTION TO ADMIT  
COUNSEL  
PRO HAC VICE

-against-

THE CITY OF NEW YORK, *et al.*,

Defendants.

05 CV. 9901 (KMK) (JCF)

x

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Andrea Ritchie, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of

Joey L. Mogul  
People's Law Office  
1180 N. Milwaukee  
Chicago, IL 60622  
ph: (773) 235-0070  
fx: (773) 235-6699

U.S. DISTRICT COURT  
FILED COURT  
2007 JUL 23 PM 2:34  
S.D. OF N.Y.

Joey L. Mogul is a member in good standing of the Bar of Illinois.

There are no pending disciplinary proceedings against Joey Mogul in any State or Federal Court.

Dated: New York, New York  
July 17, 2007

Respectfully submitted,

  
ANDREA J. RITCHIE  
(AR2769)  
Attorney for Plaintiff Kaitlyn Tikkun  
428 Park Place, 2B  
Brooklyn, NY 11238  
(646) 831-1243

**CERTIFICATE OF SERVICE**

TO: James Mirro, Esq.  
NYC Law Department  
Attorney for Defendants  
100 Church Street  
New York, NY 10007

ANDREA J. RITCHIE, an attorney, hereby certifies that she caused a copy of the foregoing motion and attached affidavit to be served on the counsel named above by hand delivery on the 17th day of July, 2007.

  
Andrea J. Ritchie  
ANDREA J. RITCHIE (AR 2769)

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-x-

KAITLYN TIKKUN,

Plaintiff,

-against-

THE CITY OF NEW YORK, *et al.*,

AFFIDAVIT OF  
ANDREA RITCHIE IN  
SUPPORT OF  
**MOTION TO ADMIT  
COUNSEL  
PRO HAC VICE**

Defendants.

-x-

**05 CV. 9901 (KMK) (JCF)**

State of New York )  
                      )  
                      ss:  
County of New York )

ANDREA RITCHIE, being duly sworn, hereby deposes and says as follows:

1. I am counsel for Plaintiff in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Joey L. Mogul as counsel *pro hac vice* to represent Plaintiff in this matter.
2. I am a member in good standing of the bar of the State of New York and was admitted to practice law in January 2003. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Joey L. Mogul since 2003.
4. Ms. Mogul is a partner at the People's Law Office in Chicago, Illinois
5. I have found Ms. Mogul to be a highly skilled attorney and a person of the utmost integrity. She is experienced in federal civil rights litigation and police misconduct practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of Joey L. Mogul, *pro hac vice*.
7. I respectfully submit a proposed order granting the admission of Joey L. Mogul, *pro hac vice*, which is attached hereto as Exhibit A.

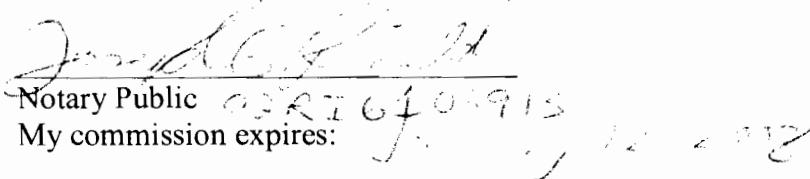
WHEREFORE it is respectfully requested that the motion to admit Joey L. Mogul, *pro hac vice*, to represent Plaintiff in the above captioned matter, be granted.

Respectfully submitted,

  
Andrea J. Ritchie (AR 2769)

Dated: New York, New York  
July 16, 2007

Notarized:

  
Notary Public AR 276913  
My commission expires: 12-31-2012

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----x

KAITLYN TIKKUN,

Plaintiff,

ORDER FOR  
ADMISSION  
PRO HAC VICE  
ON WRITTEN MOTION

-against-

THE CITY OF NEW YORK, *et al.*,

Defendants.

05 CV. 9901 (KMK) (JCF)

-----x

Upon the motion of Andrea J. Ritchie, attorney for Plaintiff Kaitlyn Tikkun, and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Joey L. Mogul  
People's Law Office  
1180 N. Milwaukee  
Chicago, IL 60622  
ph: (773) 235-0070  
fx: (773) 235-6699  
JoeyMogul@aol.com

is admitted to practice *pro hac vice* as counsel for Kaitlyn Tikkun in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of the Court.

Dated:           New York, New York  
                July \_\_, 2007

-----  
United States District Judge

## Certificate of Admission To the Bar of Illinois

I, Juleann Hornyak, Clerk of the Supreme Court of Illinois, do hereby certify that

Joey L. Mogul

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on November 6, 1997 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto placed my hand and affixed the seal of said Supreme Court, at Springfield, in said State, this Friday, July 13, 2007.



Clerk

# CERTIFICATE OF GOOD STANDING



*United States of America*

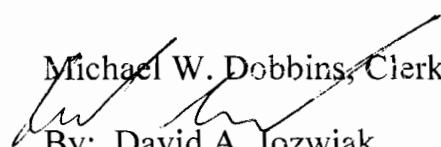
}ss. Joey L. Mogul

*Northern District of Illinois*

I, Michael W. Dobbins, Clerk of the United States District Court  
for the Northern District of Illinois,

DO HEREBY CERTIFY That Joey L. Mogul  
was duly admitted to practice in said Court on (12/18/1997)  
and is in good standing as a member of the bar of said court.

Dated at Chicago, Illinois  
on (07/10/2007 )

  
Michael W. Dobbins, Clerk,  
By: David A. Jozwiak  
Deputy Clerk